

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC,

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.,

Defendants.

Case No. 23-cv-7133-LGS-JW

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Andrew M. Gass, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants Internet Archive, Brewster Kahle, George Blood, and George Blood L.P. in the above-captioned matter.

I am a member in good standing of the Bar of the State of California, and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: September 8, 2023
San Francisco, CA

Respectfully Submitted,

LATHAM & WATKINS LLP

/s/ Andrew M. Gass

Andrew M. Gass

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Tel: (415) 391-0600

Fax: (415) 395-8095

Email: andrew.gass@lw.com

*Counsel for Defendants Internet Archive,
Brewster Kahle, George Blood, and George
Blood, L.P.*